

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AKSEL MYTEVELI,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. 05-11453-NG
)	
U.S. CITIZENSHIP AND)	
IMMIGRATION SERVICES, ET AL.)	
)	
Defendants.)	
)	

JOINT MOTION TO STAY ALL HEARINGS AND FILING FOR 120 DAYS

Now comes the Plaintiff, Aksel Myteveli ("Myteveli"), and the Defendants, U.S. Citizenship and Immigration Services ("Immigration Service"), jointly, by and through their respective attorneys, respectfully request that this Honorable court stay all hearings and required filings in this case for another period of 120 days beginning on this day, March 6, 2006. During the preceding 120 days, the Immigration Service forwarded finger print forms to Myteveli, which he completed and returned. The Immigration Service is currently processing those finger prints, as well as a form identified as "Form G325B," which Myteveli is required to complete because he served in the military.

WHEREFORE, the parties hereto jointly request this Honorable court to grant a stay of all hearings and filings in the case for a period of 120 days as first requested above.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/Christopher Alberto
Ron Meyers, Esq.
6 Beacon Street, Suite 715
Boston, MA 02108
(617) 523-4100

By: /s/Christopher Alberto
Christopher Alberto
Assistant U.S. Attorney
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3311

March 6, 2006

CERTIFICATE OF SERVICE

This is to certify that the foregoing Joint Motion to Stay all Hearings and Filings for 180 Days, filed through the Electronic Case Filing system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/Christopher Alberto
Christopher Alberto
Assistant U.S. Attorney